

## ***Purpose and Need***



## Parsons Transportation Group

11405 North Pennsylvania Street, Suite 100  
Carmel, IN 46032  
Phone: 317.569.3670 Fax: 317.569.3680

# Record of Meeting

**Subject:** US 31 Interagency Review Meeting and Fieldtrip  
Purpose and Need Statement / Range of Preliminary Alternatives to be Considered

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**Location:** Hampton Inn - Carmel, IN

**Date/Time:** June 28, 2001 / 10:00 am

<b>Attendees:</b>	Virginia Laszewski	US Environmental Protection Agency, Region 5 (USEPA)
	Mike Litwin	US Fish & Wildlife Service (USFWS)
	Janice Osadczuk	Indiana Department of Transportation (INDOT)
	Chris Baynes	Indiana Department of Transportation (INDOT)
	Robert Dirks	Federal Highway Administration (FHWA)
	Cory Grayburn	Parsons Transportation Group (PTG)
	Mark Fialkowski	Parsons Transportation Group (PTG)
	Rob Padgett	Parsons Transportation Group (PTG)
	Erin Breetzke	Parsons Transportation Group (PTG)
	Kevin Linne	Parsons Transportation Group (PTG)
	Andrew Melnykovich	Doe Anderson (DA)

**Amended:** August 28, 2001

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## A. MEETING DISCUSSION

- The meeting started with a PowerPoint presentation by Cory (PTG) on the US 31 Improvement Project's Purpose and Need and Range of Preliminary Alternatives to be Considered.
- Virginia (USEPA) asked why the Levels of Service (LOS) from the ConNECTIONS (Northeast Corridor Transportation) Study were worse than those shown in the US 31 study. Mark (PTG) indicated that the traffic analysis for the ConNECTIONS Study was much more general than the US 31 study and probably reflected a worse case scenario. For the US 31 project, PTG conducted a detailed LOS analysis in which the software from the traffic model was calibrated to more accurately reflect the actual traffic conditions that were observed in the field.
- Virginia (USEPA) asked why PTG used the intersections and not the segments to calculate LOS. Mark (PTG) indicated that the intersections are the limiting/controlling factors along the corridor and ultimately determine the level of congestion that would occur along each segment. A segment analysis would not reflect the congestion or "backup" that is occurring as a result of the intersections.
- Virginia (USEPA) asked exactly what is wrong with the road and why does it need to be upgraded. Cory (PTG) stated that traffic congestion and high crash rates are the primary reasons for improving US 31.
- Virginia (USEPA) stated that "Consistency with Local, Regional, and Statewide Long Range Transportation Plans" should not be listed as a project need. She added that the need for a project is not justified because it is listed on such plans. She indicated that by using this as an evaluation criteria, the only "alternatives" that

would meet the project need are those that are listed in the transportation plans. Mike (USFWS) suggested that the Purpose and Needs be separated into two categories or levels of importance: 1) those that are required to be met such as traffic congestion and safety and 2) those that should be considered such as consistency with transportation plans. Everyone at the meeting agreed with this suggestion.

- Virginia (USEPA) asked what the evaluation criteria would be for determining whether the alternatives meet the project's purpose and need. Cory (PTG) stated that Levels of Service (LOS) would be used to measure traffic congestion. Safety would be measured by comparing existing US 31 crash rates with the statewide average crash rates for roadways that are the same as the proposed alternatives. The goal is to reduce the crash rates along the US 31 corridor to the statewide average rates. With regard to traffic congestion, the goal would be LOS C (desired) or D (acceptable).
- Virginia (USEPA) requested that INDOT incorporate information from the ConNECTIONS Study into the US 31 project, specifically with regard to mass transit issues and alternatives.
- Janice (INDOT) stressed that we need to identify and collect information from other transit, bike, pedestrian, commuter, and/or mobility studies that may have been conducted in the area.
- Virginia (USEPA) asked if an Origin and Destination (O & D) Survey was conducted. Janice (INDOT) said an O & D survey was not conducted for the project. Cory (PTG) indicated that some general traffic movement patterns could be derived from the traffic model such as the percent of through traffic. Virginia suggested that more traffic information would be needed to better evaluate the off-alignment alternatives.
- In the Purpose and Need report, Virginia (USEPA) asked for definitions of the Major Corridor Investment Benefit Analysis System (page 3) and the National Truck Network (page 17). Janice (INDOT) stated that PTG would provide the definitions for these terms to the agencies as a follow-up item to the meeting.

#### Follow-up:

**Major Corridor Investment Benefit Analysis System:** As part of INDOT's 1995 Long Range Transportation Plan, three corridors were identified statewide (including US 31) to be studied for the potential economic benefits that would be associated with any proposed improvements and/or upgrades. For US 31, this resulted in the completion of the *Economic Impacts of US 31 Corridor Improvements* report in 1998.

**National Truck Network:** The Surface Transportation Assistance Act (STAA) of 1982 required the designation of a national network of highways that allows the passage of trucks of specified minimum dimensions and weight. The National Truck Network includes all interstate highways and a significant portion of the former Federal-aid primary system that was built to accommodate large truck travel. Under Indiana State statute, all principal arterials are available to commercial vehicles with the dimensions authorized by the STAA, subject to local restrictions.

- Virginia (USEPA) asked if INDOT was going to coordinate with local governments and the public regarding the issues of sidewalks and pedestrian/bicycle access. Mark (PTG) said that PTG would work with the local communities to identify any plans or needs for east-west non-motorized trails such as the Monon Trail.
- Virginia (USEPA) asked if there would be sidewalks on US 31. Mark (PTG) said probably not if it is upgraded to urban freeway standards. PTG, however, will evaluate the option of providing sidewalks if the local communities want them.
- Virginia (USEPA) requested that INDOT address the land use plans of the local communities. She also requested that INDOT address potential project-related land use impacts north of SR 38.

- Virginia (USEPA) asked if the traffic volumes shown in Table 3-1 on page 5 were daily. Rob (PTG) stated that those traffic numbers represented Average Annual Daily Traffic (AADT).
- **Amendment:** Virginia (USEPA) stated that based on the current information, the underlying problems that need to be solved appear to be congestion and safety issues of the existing roadway. Consequently, Purpose and Need should be identified accordingly and that measurable objectives should be based on these underlying problems. In addition, there seems to be no problem with economic growth in this study area; therefore, "economic growth" does not appear to be an underlying need for this roadway project.
- Mike (USFWS) said he inspected the existing US 31 route. He commented that the area by Cool Creek at the SR 431 interchange is sensitive and that avoidance and mitigation measures should be considered. Additionally, the area along Cool Creek near US 31 north of 151<sup>st</sup> Street and Cool Creek Park should be avoided as much as possible.
- Mike (USFWS) requested a hard copy of the meeting's PowerPoint presentation on the project's Purpose and Need and Preliminary Alternatives. Janice (INDOT) said that copies of the presentation would be distributed to the agencies along with the meeting minutes. If needed, a CD of the PowerPoint presentation could also be provided.

#### **B. FIELDTRIP DISCUSSION AND COMMENTS**

(A list and map of the field trip's 25 stops/points of interest was distributed to all attendees.)

- Between stops 7 and 8, located behind a Chinese Restaurant and just south of the US 31 and SR 431 interchange, Mike (USFWS) identified a sensitive riparian habitat associated with Hiway Run, a tributary to Cool Creek. This area is a floodplain that supports forest and wetland habitat. He emphasized that impacts to this area should be avoided or minimized as much as possible.
- At Stop 8, Mike (USFWS) and Virginia (USEPA) noted the wetlands that were being filled as part of the Lowe's development. Mike (USFWS) indicated that he received notification of a Regional General Permit submitted by Hamilton County for wetland impacts associated with the access road/ramp between SR 431 and 146<sup>th</sup> Street but was unaware of any permits for the Lowe's development. He indicated that he would contact the Corps of Engineers to determine if any permits have been submitted or granted for this activity. Cory (PTG) stated that Hamilton County has requested permission from INDOT to access SR 431. Permission to grant such access by INDOT is pending the evaluation of the ramp's potential impacts to traffic conditions at Greyhound Pass and future US 31 improvements.
- Virginia (USEPA) stated that knowing the travel patterns (where people are coming from and going to and when) within the project area would help in the development and evaluation of project alternatives. Cory (PTG) indicated that an O & D survey is usually needed to obtain such information. Janice (INDOT) and Robert (FHWA) agreed and requested that PTG prepare a supplemental scope of work to conduct an O & D survey.
- **Amendment:** Virginia (USEPA) stated that the comments she has provided during the Interagency Review Meeting and field trip will represent her official comments on the Purpose and Need/Preliminary Alternatives Package. Therefore, she will not be submitting written comments.

The aforementioned represents our understanding and interpretation of the items discussed and the conclusions reached. Please notify us of any revisions or modifications to this Record of Meeting.

**Record of Meeting prepared by: Cory Grayburn/Erin Breetzke (PTG)**



Indiana Department of Natural Resources

Frank O'Bannon, Governor  
Larry D. Macklin, Director

Diversity and Habitat Protection Unit  
Division of Fish and Wildlife  
402 W. Washington Street, Rm. W-273  
Indianapolis, IN 46204

22 May 2001

Mr. Cory Grayburn  
Deputy Project Manager  
Parson Transportation Group  
11405 North Pennsylvania Street, Suite 100  
Carmel, IN 46032

Re: DNR #8610 - Proposed improvements to US 31: I-465 to State Road 38; Hamilton County, Des. No. 9905500

Dear Mr. Grayburn:

The Indiana Department of Natural Resources has reviewed the above referenced project per your request. Our agency offers the following comments for your information and in accordance with the national Environmental Policy Act of 1969.

This proposal may require the formal approval of our agency for construction in a floodway pursuant to the Flood Control Act (IC 14-28-1). Please see the enclosure for more information concerning this.

The Natural Heritage Program's data have been checked. To date, no plant or animal species listed as state or federally threatened, endangered, or rare have been reported to occur in the project vicinity.

The Division of Fish and Wildlife cannot offer specific comments as the submitted document does contain enough detail for the identification and assessment of impacts to natural resources. The division recommends that planning efforts focus on avoiding impacts to wetlands, wooded and forest habitats, and stream and riparian habitats. The division will offer more specific comments when more detailed information becomes available for review.

We appreciate this opportunity to be of service and apologize for not being able to respond sooner in this matter. Please do not hesitate to contact me at (317) 232-4080 if our agency can be of further assistance.

Sincerely,

Stephen H. Jose  
Environmental Coordinator



Indiana Department of Natural Resources

Frank O'Bannon, Governor  
Larry D. Macklin, Director

Diversity and Habitat Protection Unit  
Division of Fish and Wildlife  
402 W. Washington St., Rm. W-273  
Indianapolis, IN 46204-2748

24 July 2001

Mr. Cory Greyburn  
Deputy Project Manager  
Parsons Transportation Group  
11405 North Pennsylvania Street, Suite 100  
Carmel, IN 46032

**Re: DNR #8610-1 - Proposed improvements to US 31: I-465 to SR 38; Hamilton County, Des. No. 9905500**

Dear Mr. Greyburn:

The Indiana Department of Natural Resources has reviewed the above referenced proposal per your request. Our agency offers the following comments for your information and in accordance with the National Environmental Policy Act of 1969.

Our agency provided comments to you on 22 May 2001 in response to a "Purpose and Needs" statement; those comments remain in effect. In addition, Bitternut Woods Nature Preserve occurs in the southwest quarter of Section 3, T. 17N., R 3E. It appears that the project will not affect this state-dedicated nature preserve.

Our agency appreciates the opportunity to be of service in this matter. Please do not hesitate to contact me at (317) 232-4080 if we can be of further assistance.

Sincerely,

Stephen H. Jose  
Environmental Coordinator



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

### BLOOMINGTON FIELD OFFICE (ES)

620 South Walker Street

Bloomington, Indiana 47403-2121

(812) 334-4261 FAX 334-4273

July 25, 2001

IN REPLY REFER TO:

Mr. Cory Grayburn  
Parsons Transportation Group  
11405 North Pennsylvania Street, Suite 100  
Carmel, Indiana 46032

Project : US 31 improvements, I-465 to SR 38 (Des. #9905500)  
Waterway: Multiple stream crossings  
Work Type: Road reconstruction and widening  
County(ies): Hamilton

Dear Mr. Grayburn:

This provides the U.S. Fish and Wildlife Service (FWS) comments in response to the June 28, 2001 interagency review meeting and field inspection for the aforementioned project.

These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (16 U.S.C. 661 et. seq.) and are consistent with the intent of the National Environmental Policy Act of 1969, the Endangered Species Act of 1973, and the U. S. Fish and Wildlife Service's Mitigation Policy.

#### PURPOSE AND NEED

We concur with The US EPA representative's comments at the interagency review meeting that origin/destination studies should be performed to ensure that the selected route will best address the traffic patterns which are generating the congestion problems.

We also recommend that you use the results of the origin/destination studies to give full consideration to mass transit alternatives, possibly in concert with road construction alternatives, to address the congestion problems on US 31. Mass transit facilities at key locations may reduce the scope of road reconstruction, or may improve the level of service beyond what the road reconstruction alone can attain. The benefits of mass transit alternatives may not be fully realized until facilities have been in place long enough for commuters to become accustomed to using them. A substantial increase in mass transit use would produce environmental benefits in terms of water quality and air quality.

Serious consideration should be given to pedestrian/bicycle facilities, including multi-use trails on all route alternatives.

## ROUTE ALTERNATIVES AND PROJECT IMPACTS

We have conducted an inspection of potentially sensitive areas along the existing US 31 route alternative. As discussed in our previous letters and in your meeting minutes, our major concern with that alternative is the Cool Creek corridor and floodplain wetland complex that is located near the existing US 31/SR 431 interchange. A reconfiguration of the US 31/SR 431 interchange that had substantial impacts on this area would be unacceptable to this agency. Another area of concern is a forested section of the Cool Creek floodplain near US 31 north of 156<sup>th</sup> Street. Due to the proximity to Cool Creek at this location, no new right-of-way should be taken from the forested floodplain.

We have not inspected the other route alternatives that were presented at the meeting, except for the driving survey from existing roads. We are not aware of any highly sensitive areas that would be affected by the other routes, however there are several potential crossings of forested stream corridors, including Williams Creek and several of its tributaries. Minor wetland impacts may also occur on these routes. We may need additional field inspections to further evaluate these issues.

The general feeling among INDOT and FHWA staff at the meeting was that the far western routes may not fulfill the project purpose of reducing congestion, however more information on this subject may be provided by the results of the origin/destination studies.

## ENDANGERED SPECIES

As stated in our previous letters, the proposed project is within the range of the Federally endangered Indiana bat (*Myotis sodalis*) and federally threatened bald eagle (*Haliaeetus leucocephalus*). At this time there are no eagle nests or significant habitat areas near the project corridor.

There is suitable summer habitat for Indiana bats in forested areas along Cool Creek, and possibly in other forested areas along the project route. There are no current records of Indiana bats near the project corridor but to our knowledge none of the streams in the affected area have been surveyed. There are multiple records of this species in adjacent Marion County, including a location within 10 miles of the project. Since the boundaries of the impact area have not yet been established we cannot make a determination as to whether the project may adversely affect the Indiana bat. The area of greatest concern is the Cool Creek corridor around and downstream from the US 31/SR 431 interchange. If any design alternatives would result in substantial impacts to the forested stream corridor and floodplain, we recommend that a bat survey be performed in this area.

This endangered species information is provided for technical assistance only, and does not fulfill the requirements of Section 7 of the Endangered Species Act.



## RECOMMENDATION SUMMARY

## US 31/SR 431 Interchange

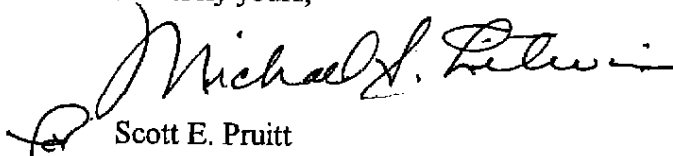
1. Avoid relocation of Cool Creek or its tributaries, and avoid channel/bank disturbance except for the minimum necessary for bridge crossings.
2. Avoid any significant alteration of the wetlands and forested floodplain.
3. Mitigate for unavoidable forest loss by reforestation within the Cool Creek floodplain.

## Other Stream Crossings Floodplains

1. Avoid forest clearing in the area on the east side of US 31 north of 156<sup>th</sup> Street, where the highway is immediately adjacent to the forested floodplain of Cool Creek.
2. Design crossings to avoid channel relocations and otherwise minimize alterations of the stream channels and riparian zones.
3. Implement standard mitigation measures as identified in our previous letters.

For further discussion please contact Mike Litwin at (812) 334-4261 (ext. 205).

Sincerely yours,

  
Scott E. Pruitt  
Field Supervisor

cc: Federal Highway Administration, Indianapolis, IN  
Andrew Pelloso, IDEM, Water Quality Standards Section, Indianapolis, IN  
Steve Jose, Indiana Division of Fish and Wildlife, Indianapolis, IN  
Manager, Environmental Assessment, INDOT, Rm 1107, Indianapolis, IN



DEPARTMENT OF THE ARMY  
U.S. ARMY ENGINEER DISTRICT, LOUISVILLE  
CORPS OF ENGINEERS  
P.O. BOX 59  
LOUISVILLE, KENTUCKY 40201-0059  
FAX: (502) 315-6677

July 27, 2001

Operations Division  
Regulatory Branch (North)  
ID No. 200100990-gdn

Mr. Cory Grayburn  
Parsons Transportation Group  
11405 North Pennsylvania Street  
Suite 100  
Carmel, Indiana 46032

Dear Mr. Grayburn:

This is in regard to your letter dated July 17, 2001, requesting comments on our review of the purpose and need summary for the U.S. Highway 31 Improvement Project. The project begins at the intersection of Interstate 465 extending north to State Route 38, in Hamilton County, Indiana.

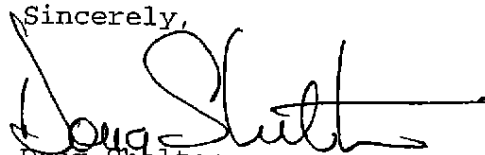
The information submitted has been reviewed in accordance with Section 404 of the Clean Water Act (CWA), under which the U.S. Army Corps of Engineers regulates the discharge of dredged and/or fill material in "waters of the United States," including wetlands. We have completed our review of the purpose and need summary. We have also reviewed information submitted which identifies the study area and a list of preliminary alternatives to be considered later as part of the Environmental Impact Statement (EIS) process.

Our review of the information submitted is limited to the effects the project may have on U.S. waters including any adjacent wetland areas. Although the report does not specifically identify any such waters, the consideration of alternatives relative to purpose and need for the project may become necessary should the project impact any special aquatic sites.

Please note that wetlands and/or riffle and pool complexes within stream channels are classified as special aquatic sites. This is found in the Federal Register 40 CFR 230.10. Any project covered under Section 404 of the CWA must comply with the Section 404 (b)(1) guidelines outlined in 40 CFR 230.10 before a Department of the Army permit is issued. Compliance with the guidelines should also be addressed in the Draft EIS.

If you have any questions concerning this matter, please contact this office at the above address, ATTN: CELRL-OP-FN or call Mr. Gerry Newell at (502) 315-6683. Any correspondence on this matter should refer to our ID Number 200100990-gdn.

Sincerely,

A handwritten signature in black ink, appearing to read "Doug Shelton", with a long horizontal line extending from the end of the signature.

Doug Shelton  
Chief, North Section  
Regulatory Branch

## Grayburn, Cory

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From: Laszewski.Virginia@epamail.epa.gov  
Sent: Monday, August 13, 2001 9:53 AM  
To: Grayburn, Cory  
Cc: jasadczuk@indot.state.in.us; robert.dirks@fhwa.dot.gov; Westlake.Kenneth@epamail.epa.gov  
Subject: US31 - request amendment to "Record of Meeting" document and accompanying cover letter

Dear Mr. Grayburn,

I recently returned from vacation and looked over the packet of information you sent on the US 31 Project. Items in the packet included: (1) cover letter dated July 17, 2001, (2) Record of Meeting document you prepared for the US 31 Interagency Review Meeting held June 28, 2001, (3) June 28th Field Trip agenda w/map, and (4) hard copy of June 28, 2001 Interagency Review Meeting power point presentation.

Your cover letter requests that I submit my written comments regarding the project's Purpose and Need and Range of Preliminary Alternatives. Since I stated my comments on the Purpose and Need document and the preliminary alternatives during the June 28, 2001, Interagency Review Meeting, I will not be submitting written comments and stated so during the Interagency Review Meeting.

I noticed one error in the Record of Meeting on page 3, third complete bullet. The existing record states that I "... emphasized the importance of identifying and focusing on the real underlying problems, such as socioeconomic growth, and developing measurable objectives." During the meeting I did not say or imply that "socioeconomic growth" was an underlying problem. My point was that, based on the current information, the underlying problems that need to be solved appear to be congestion and safety issues of the existing roadway. Consequently Purpose and Need should be identified accordingly and that measurable objectives should be based on these underlying problems, if this is the case. There is no need to unduly complicate Purpose and Need. It seems apparent from the Field Trip that there is no problem with economic growth in this study area and consequently "economic growth" does not appear to be an underlying need for this roadway project, unless you can substantiate it.

Please amend the Record of Meeting and acknowledge that I have provided comments on Purpose and Need and Preliminary Alternatives at the Interagency Review Meeting and Field Trip. If you have any questions or wish to discuss the above comments, you may call me at 312/886-7501 or email me at laszewski.virginia@epa.gov.

Thank you,

Virginia Laszewski  
USEPA - Region 5  
OSEA, EFEB

## ***Preliminary Alternatives***



## **Parsons Transportation Group**

11405 North Pennsylvania Street, Suite 100  
Carmel, IN 46032  
Phone: 317-569-3670 Fax: 317-569-3680

# **Record of Meeting**

**Subject:** US 31 Interagency Review Meeting and Fieldtrip  
Preliminary Alternatives Analysis and Screening Report

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**Location:** Hampton Inn - Carmel, IN

**Date/Time:** August 7, 2002 / 10:00 a.m.

<b>Attendees:</b> Forest Clark	US Fish and Wildlife Service (USFWS)
Virginia Laszewski	US Environmental Protection Agency (USEPA)
Brian Boscor	Indiana Dept. of Natural Resources (IDNR)
Kent Hanover	Indiana Dept. of Natural Resources (IDNR)
Paul Schmidt	Indiana Dept. of Transportation (INDOT)
Amanda Hamm	Indiana Dept. of Transportation (INDOT)
Robert Dirks	Federal Highway Administration (FHWA)
Cory Grayburn	Parsons Transportation Group (PTG)
Erin Breetzke	Parsons Transportation Group (PTG)
Peter Reinhofer	Parsons Transportation Group (PTG)
Jim Lutterbach	Parsons Transportation Group (PTG)
Steve Cecil	Parsons Transportation Group (PTG)

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## **A. MEETING DISCUSSION**

Cory (PTG) started the meeting with a PowerPoint presentation that summarized the findings of the Preliminary Alternatives Analysis and Screening Report. This presentation was also shown at the project's second Public Meeting held on July 30. Following the presentation, Cory (PTG) briefly reviewed the findings of the report again using the display boards that were also shown at the Public Meeting. He discussed the project's purpose and need, the development of the preliminary alternatives, the analysis and screening methodology, and the preliminary alternatives that were eliminated and those that were selected to be carried forward for more detailed studies in the Draft Environmental Impact Statement (DEIS). He mentioned that about 600 people attended the Public Meeting held on July 30 and that the majority of them were against Alternative G, which is the eastern bypass of the Town of Westfield. The floor was then opened for questions and comments.

- Virginia (USEPA) asked if the Transportation Demand Management (TDM) and the Transportation System Management (TSM) alternatives would be assessed alone or in combination with the build options.

Cory (PTG) stated that TSM and TDM options will not be combined with the build alternatives. However, some TSM options such as signal coordination and timing are inherently part of the build alternatives. Moreover, because the build alternatives would result in all or most of the existing US 31 being upgraded to a freeway (i.e., at-grade intersections would be replaced by interchanges), the purpose and need of the project would be met and there would be no need to also implement TSM and TDM options. As for Alternative G, the bypass of the Town of Westfield would eliminate the need for any TSM or TDM options for the unimproved section of US 31 in that area.

- Robert (FHWA) asked how the TSM/TDM alternatives would be evaluated for the DEIS.

Cory (PTG) said the Preliminary Alternatives Analysis and Screening Report determined that TDM (e.g., flextime and carpooling), TSM (e.g., signal coordination/timing), and mass transit alternatives would not meet the project's need individually. However, the combination of all of these options will be evaluated in the DEIS in greater detail as part of the Transportation Management Alternative to determine if they cumulatively could meet the project's need.

Robert (FHWA) clarified by stating that all of these management techniques will be combined into one alternative, but any one could be implemented at any time in the future by the local or regional transportation organization.

- Paul (INDOT) asked if there were any plans by any local entity in Hamilton County to implement mass transit.

Cory (PTG) responded that there are currently no plans for mass transit in Hamilton County.

- Virginia (USEPA) asked if the current project corridor is within the limits of the MPO.

Steve (PTG) indicated that most of the project area such as the Town of Westfield and the City of Carmel falls within the MPO limits. There are some areas, however, that are outside the MPO.

- Virginia (USEPA) asked if the project was taking into consideration the Northeast Corridor Study (i.e., mass transit via light rail) and noted that whichever alternative is chosen does not preclude the use of light rail.

Peter (PTG) indicated that yes this study was taking that into consideration because the NE Corridor included the evaluation of a bus route through the City of Carmel.

- Virginia (USEPA) stated that the purpose and need placed too much emphasis on consistency with regional and statewide long range transportation plans and that this is not a justifiable purpose or need for the project nor should it be used in the selection of a specific alternative.

Cory (PTG) emphasized that the consistency with transportation plans was viewed as a secondary project need and was not used to eliminate or select any alternatives. The alternatives were evaluated and screened based on the project's primary purpose and need of reducing traffic congestion and improving safety on US 31. He stated that all future reference or documentation of the project's purpose and need will show consistency with regional and statewide plans only as additional information or a side note and not part of the project's primary purpose and need.

- Virginia (USEPA) requested that future documents include a definition or an explanation of a "statewide mobility corridor".
- Virginia (USEPA) asked if an Origin and Destination (O&D) study had been conducted for the project.

Cory (PTG) indicated that a standard O&D study had not been conducted because of legal limitations in the state of Indiana. However, a survey of the major employers along the US 31 corridor was conducted to collect employee zip codes and determine commuting patterns. Additionally, commuting data is also being used from the 1990 US Census and STATS Indiana.

- Virginia (USEPA) asked if the Transportation Management Alternative would include eliminating any intersections.

Peter (PTG) indicated that eliminating intersections would alter traffic patterns and increase traffic volumes and congestion at the remaining intersections, which are already congested and/or are projected to be congested.

- Robert (FHWA) asked why we are keeping the option of an interchange at 126<sup>th</sup> Street if Carmel wants one at 131<sup>st</sup> Street.

Cory (PTG) stated that the 126<sup>th</sup> interchange was originally developed and recommended in the MIS and that the existing traffic volumes are much higher than at 131<sup>st</sup> Street, where currently no through or cross traffic is allowed. The 131<sup>st</sup> interchange was added at the request of the City of Carmel. As part of the preliminary alternatives analysis, it was determined that there were no fatal flaws to either interchange so both were selected to be carried forward into the DEIS for more detailed analysis.

- Paul (INDOT) asked if 131<sup>st</sup> Street provided more east/west movement through the area.

Cory (PTG) indicated that 131<sup>st</sup> Street extends farther east and west than 126<sup>th</sup> Street. The existing 131<sup>st</sup> Street and surrounding land uses, however, are less compatible with a new interchange and the associated increased traffic volumes than 126<sup>th</sup> Street.

- Virginia (USEPA) stated that Greyhound Pass looks as if it is not a major intersection.

Cory (PTG) indicated that most of the traffic on 146<sup>th</sup> Street must access US 31 via the Greyhound Pass intersection because there is no direct connection or intersection between US 31 and 146<sup>th</sup> Street.

- Virginia (USEPA) asked if level of service (LOS) would be assessed at interchanges.

Peter (PTG) answered that the LOS will be determined where the interchange ramps intersect with the cross streets. As for the mainline, the LOS will be determined for each segment between the interchanges.

Cory (PTG) added that existing cross streets where interchanges are not proposed will be evaluated as to whether they should be closed or left connected with an overpass or underpass.

- Virginia (USEPA) noted that the minutes from the Interagency Review Meeting on Purpose in Need were not in the Agency Correspondence appendix of the Preliminary Alternatives Analysis and Screening Report. For future reference, she requested that these minutes be added to the appendix as agency correspondence because they represent EPA's official comments.

- Virginia (USEPA) asked if there were any Environmental Justice issues.

Cory (PTG) indicated that the most likely location is a mobile home park located north of 181<sup>st</sup> Street and west of US 31, across from the Westfield High School. He emphasized, however, that impacts to mobile homes do not necessarily correlate to impacts to low income families. More research would be needed to identify specific low income and/or minority homes. He added that this information is difficult to collect because the primary source is often limited to US census data that presents the information by census tracts and not individual homes. The idea of conducting a survey of the individual homes that could be impacted by the project in order to determine whether they are low income and/or minority was discussed. Cory (PTG) indicated that other FHWA divisions that he has worked with rejected the idea of conducting such surveys due to privacy concerns. Robert (FHWA) stated that he would look into whether FHWA would approve of conducting a survey in order to determine Environmental Justice compliance.



## **B. FIELDTRIP**

Following the meeting, a fieldtrip was conducted of the project area to show the approximate locations of Alternatives F and G (i.e., the build alternatives selected to be carried forward for more detailed analysis in the DEIS) and their potential environmental impacts. The following comments were made during the fieldtrip:

- Virginia (USEPA) asked if stream quality data was presented in the Preliminary Alternatives Report

Cory (PTG) replied that any secondary source data that was available at the time was reviewed and the information presented in the report. He added that there was little existing data available.

Virginia (USEPA) requested that the DEIS include stream quality data.

- Virginia (USEPA) stated that the DEIS should address wetland mitigation sites and conceptual plans.
- Forest (USFWS) asked if the stormwater detention basin that was recently built as part of the expansion of the St. Vincent Carmel Hospital and supports wetland vegetation is hydrologically connected to the adjacent natural wetland.

Cory (PTG) stated the stormwater detention basin and wetland are hydrologically connected.

- Cory (PTG) mentioned that an Indiana bat survey was conducted along Cool Creek between SR 431 and 146<sup>th</sup> Street at the request of the US Fish and Wildlife Service. He added that no bats were caught during the survey. Forest (USFWS) requested a copy of the bat survey report when it is finished
- Virginia (USEPA) mentioned that there does not appear to be a need for an interchange at 191<sup>st</sup> Street. Cory (PTG) stated that 191<sup>st</sup> Street represents the only interchange and point of access between SR 32 and SR 38. It is also the only main east-west route that intersects with US 31 between these two state routes.
- Virginia (USEPA) asked why the northern logical termini is SR 38 and not SR 32.

Cory (PTG) responded that the Purpose and Need Statement identified future traffic problems at the SR 38 intersection.

- Virginia (USEPA) emphasized the importance of providing a good analysis of secondary and cumulative impacts in the DEIS.
- Virginia (USEPA) asked if there are any farmed wetlands in the project area that may be impacted.

Cory (PTG) stated that none have been identified to date.

**Record of Meeting prepared by: Erin Breetzke and Cory Grayburn (PTG)**



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Frank O'Bannon  
Governor

Lori F. Kaplan  
Commissioner

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.in.gov/idem](http://www.in.gov/idem)

July 26, 2002

Mr. Cory Grayburn  
Deputy Project Manager  
Parsons Transportation Group  
11405 North Pennsylvania Street, Suite 100  
Carmel, Indiana 46032

Dear Mr. Grayburn:

RE: Des. No. 9905500, US 31  
Improvement Project  
Hamilton County, Indiana

The Indiana Department of Environmental Management (IDEM) has reviewed the above-noted project with consideration to potential effects on the environment at or about the project location. The following topics were considered during our review process:

### **WATER AND BIOTIC QUALITY**

Recommended water pollution control measures:

1. Section 404 of the Clean Water Act requires a permit from the U.S. Army Corps of Engineers for dredging and filling in wetlands and other waters of the state of Indiana. We recommend that you contact the U.S. Army Corps of Engineers regarding the need for a Section 404 permit for this project if your project involves these activities. Contacts for the Detroit and Louisville Districts can be located at the following website:

<http://www.in.gov/idem/water/planbr/401/reglinks.html>

In the event a Section 404 permit is required, you must obtain a Section 401 Water Quality Certification from the Office of Water Quality. If the Corps of Engineers determines that the activity or area is not under their jurisdiction, you may still need to obtain authorization for the project from this office. Contact the Office of Water Quality at 317-233-8488 for additional information.

2. For undisturbed areas, the Office of Water Quality recommends that the project sponsor or an authorized agent conduct a survey of the proposed site to determine if jurisdictional wetlands are present. For your reference, the U.S. Fish and Wildlife Service National Wetland Inventory maps do not depict jurisdictional wetlands that are regulated under the Clean Water Act by the Corps of Engineers and IDEM. Under no circumstances should these maps be used to make a determination of the presence or lack of jurisdictional wetlands. Field determinations using the Corps of Engineers 1987 Wetland Delineation Manual should be conducted to verify the presence of wetlands; National Wetland Inventory maps can be used to identify potential areas of concern. Contact the U.S. Army Corps of Engineers for further information on field identification of wetland resources. Impacts to wetlands and other resources should be avoided by all construction activities to the maximum extent possible.
3. The physical disturbance of the stream and riparian vegetation, especially large trees overhanging any affected waterbodies should be limited to only that which is absolutely necessary to complete the project. The shade provided by the large overhanging trees helps maintain proper stream temperatures and dissolved oxygen for aquatic life.
4. During the construction phase and after completion of the project, appropriate structures and techniques should be utilized to minimize soil erosion. The use of straw bale barriers, silt fencing, earthen berms or other appropriate techniques around disturbed areas are recommended to prevent soil from leaving the construction site. Information and assistance regarding control of construction-related soil erosion are available from the Soil and Water Conservation District (SWCD) offices, co-located with the local field office of the USDA Natural Resource Conservation Service (NRCS) in each county.
5. For projects involving work within floodways of waterbodies, contact the Department of Natural Resources - Division of Water (317-232-4160) regarding the need for permits.
6. For projects involving impacts to fish and botanical resources, contact the Department of Natural Resources - Division of Fish and Wildlife (317/232-4080) for addition project input.
7. For projects involving water main construction, water main extensions, and new public water supplies, contact the Office of Water Quality - Drinking Water Branch (317-308-3299) regarding the need for permits.
8. For projects involving effluent discharges to waters of the State of Indiana, contact the Office of Water Quality - Permits Branch (317-233-0468) regarding the need for a National Pollution Discharge Elimination System (NPDES) permit.

9. For projects involving construction activity (which includes clearing, grading, excavation and other land disturbing activities) that result in the disturbance of five (5) acres or more of total land area, contact the Office of Water Quality - Permits Branch (317-233-0468) regarding the need for of a Rule 5 Storm Water Permit. If the land disturbing activity results in the disturbance of less than five (5) acres of total land area, but is part of a *larger common plan of development or sale* (such as the development of a subdivision or industrial park), it is still subject to storm water permitting.
10. For projects involving the construction of wastewater facilities and sewer lines, contact the Office of Water Quality - Permits Branch (317-232-8675) regarding the need for permits.

### AIR QUALITY

The above project should be designed to minimize any impact on ambient air quality in or about the project area. The project must comply with all federal and state air pollution regulations. Consideration should be given to the following:

1. What disposal method is being used for organic debris from land clearing and other waste materials? Open burning is allowed for certain types of maintenance purposes with specific conditions. If burning is allowed by the rule and is being considered, evaluate the economic and technical feasibility of non-combustion disposal options, for example removal, mulching and burial. Open burning approvals may be granted for certain projects by the Office of Air Quality (OAQ). Open Burning Rule 326 IAC 4-1 should be taken into consideration.
2. Reasonable precautions must be taken to minimize fugitive dust emissions from construction and demolition activities. Example precautions are wetting the area with water, constructing wind barriers, or treating the area with chemical stabilizers (such as calcium chloride or several other commercial products). Dirt tracked out from unpaved areas should be minimized. Please refer to Fugitive Dust Rule 326 IAC 6-4 for details. If construction or demolition is conducted in a wooded area where large blackbirds have roosted or abandoned buildings or building sections in which pigeons or bats have roosted for 3-5 years precautionary measures should be taken to avoid an outbreak of histoplasmosis. This disease is caused by the fungus Histoplasma capsulatum, which stems from bird or bat droppings that have accumulated in one area for 3-5 years. The spores from this fungus become airborne when the area is disturbed and can cause infections over an entire community downwind of the site. The area should be wetted down prior to cleanup or demolition of the project site. For more detailed information on histoplasmosis prevention and control, please contact the Acute Disease Control Division of the Indiana State Department of Health at (317) 233-7272.

3. Ensure that asphalt paving plants are permitted and operate properly. The use of cutback asphalt, or asphalt emulsion containing more than seven percent (7%) oil distillate, is prohibited during the months April through October. Please refer to 326 IAC 8-5 Asphalt Paving Rule for details.
4. If demolition or renovation of a structure will take place, asbestos and lead-based paint rules may apply. An inspection should be performed by an accredited asbestos inspector to determine if asbestos containing materials are present. If asbestos is present, rules governing project licensing will apply. Projects that involve lead-based paint activities should take the proper safety precautions to ensure the health of the buildings occupants and the safety of the environment. In projects that involve asbestos, notification rules and set schedules apply to renovation operations above a certain size and all demolition projects.

The following rules may apply to either projects involving asbestos or lead-based paint:

40 CFR 745 Lead: Requirements for Lead-Based Paint Activities in Target Housing and Child Occupied Facilities.

326 IAC 14-2 Emissions Standard for Asbestos;

326 IAC 14-10 Emissions Standard for Asbestos; Demolition and Renovation Operations, and

326 IAC 18-1 and 18-3 Asbestos Personnel Accreditation Rules.

5. If this project is the construction of a new source of air emissions or the modification of an existing source of air emissions, it will need to be reviewed for an air emissions permit or registration according to 326 IAC 2-1 Permit Review Rules. Applications for permit review can be obtained by calling 317-232-8369. New sources that use or emit hazardous air pollutants may be subject to Section 112 of the Clean Air Act and corresponding state air regulations governing hazardous air pollutants.

#### **OFFICE OF LAND QUALITY**

1. The Office of Land Quality (OLQ) does not believe the site is or represents an environmental problem, based on the information provided. However, OLQ reserves the right to reassess the site if new or additional information becomes available.
2. If the site is found to contain any areas used to dispose of solid or hazardous waste, you shall contact the OLQ at 317-308-3103.

3. If any contaminated soils are discovered during this project, they may be subject to disposal as either special or hazardous waste. Please contact the OLQ at 317-308-3103 to obtain information on proper disposal procedures.
4. There may be PCB issues related to this site. Please contact the Industrial Waste Section of OLQ at 317-308-3103 for information regarding management of any PCB wastes from this site.
5. There may be asbestos issues related to this site. Please contact the Industrial Waste Section of OLQ at 317-308-3103 for information regarding management of any asbestos wastes from this site.

The Office of Land Quality is making file information pertaining to the Environmental Impact Statement Early Coordination program available to the public. These files are open to the public during regular business hours. The file room is located in Room N1201, Indiana Government Center North, 100 North Senate Avenue, Indianapolis.

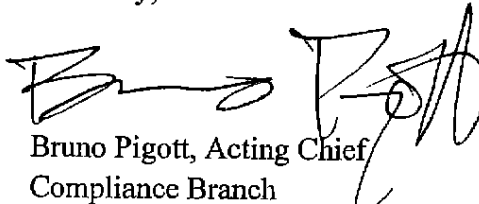
#### **FINAL REMARKS**

We reserve the right for further review if the scope of the project, or any of its aspects, should change significantly from that which has been proposed, or we are made aware of factors which could have detrimental environmental effects.

Please note that this letter does not constitute a permit, license, endorsement or any other form of approval on the part of either the Indiana Department of Environmental Management or any other Indiana state agency.

Should you have any questions relating to our review, please contact Gary Starks, Review Coordinator, at 317-232-8795.

Sincerely,

  
Bruno Pigott, Acting Chief  
Compliance Branch  
Office of Water Quality

Project No. 4212

that Alternative G could have substantial impacts on the stream, floodplain and riparian forest in this location, and also further upstream along Cool Creek.

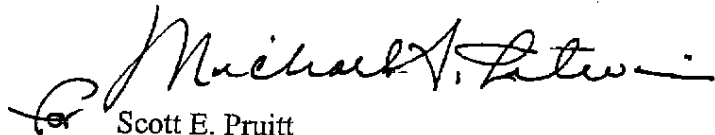
#### ENDANGERED SPECIES

As stated in our previous letters, the proposed project is within the range of the Federally endangered Indiana bat (*Myotis sodalis*) and federally threatened bald eagle (*Haliaeetus leucocephalus*). All of our previous endangered species comments are still appropriate. For purposes of Section 7 consultation the Federal Highway Administration should either consider the Indiana bat present in the potentially affected habitat areas along Cool Creek, or conduct mist net surveys to demonstrate that the project will not cause adverse effects to the Indiana bat. If bat surveys are conducted, please coordinate with this office in advance to ensure that all FWS permitting requirements and survey protocols are being addressed.

This endangered species information is provided for technical assistance only, and does not fulfill the requirements of Section 7 of the Endangered Species Act.

For further discussion please contact Mike Litwin at (812) 334-4261 (ext. 205).

Sincerely yours,

  
Scott E. Pruitt  
Field Supervisor

cc: Federal Highway Administration, Indianapolis, IN  
Virginia Laszewski, US EPA, B-19J, Chicago, IL  
Andrew Pelloso, IDEM, Water Quality Standards Section, Indianapolis, IN  
Christie Kiefer, Indiana Division of Fish and Wildlife, Indianapolis, IN  
Manager, Environmental Assessment, INDOT, Rm 1107, Indianapolis, IN



# United States Department of the Interior

FISH AND WILDLIFE SERVICE

BLOOMINGTON FIELD OFFICE (ES)

620 South Walker Street

Bloomington, IN 47403-2121

(812) 334-4261 FAX (812) 334-4273

August 30, 2002



Mr. Cory Grayburn  
Parsons Transportation Group  
11405 North Pennsylvania Street, Suite 100  
Carmel, Indiana 46032

Project : US 31 improvements, I-465 to SR 38 (Des. #9905500)  
Waterway: Multiple stream crossings  
Work Type: Road reconstruction and widening  
County(ies): Hamilton

Dear Mr. Grayburn:

This letter provides the U.S. Fish and Wildlife Service (FWS) comments on the US 31 Preliminary Alternatives Analysis and Screening Report dated July, 2002. The FWS participated in the interagency review meeting of August 7, 2002.

These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (16 U.S.C. 661 et. seq.) and are consistent with the intent of the National Environmental Policy Act of 1969, the Endangered Species Act of 1973, and the U. S. Fish and Wildlife Service's Mitigation Policy.

## Alternatives Screening Process

The alternative screening process used two phases; Phase 1 addressed purpose and need, followed by Phase 2 which addressed environmental impacts. Six of the ten highway build alternatives, along with mass transit alternatives and both non-structural alternatives (TDM) and TSM), were eliminated in Phase 1 because they did not meet the purpose and need. Two other build alternatives (E and H) were eliminated in Phase 2 due to the extent of environmental impacts. The remaining alternatives carried forward are F (freeway standards on existing alignment) and G (freeway standards with new alignment north of 161<sup>st</sup> Street).

It seems unusual that more than half of the preliminary build alternatives do not need the project purpose and need. All of the build alternatives which avoided the environmentally sensitive area at the SR 431 interchange were eliminated, therefore all



the remaining alternatives are likely to have substantial impacts on the wetlands and floodplain in that area.

We recommend that mass transit be kept as a component of the alternatives being carried forward. Opting entirely for highway construction instead of mass transit in urban areas will substantially increase future transportation impacts on air quality, water quality, and aquatic habitat. Keeping a mass transit component might further reduce environmental impacts by reducing the number of additional lanes needed to handle future peak period traffic.

#### Environmental Impact Analysis

We concur that the level of impact analysis was adequate for the preliminary alternatives level of analysis. Appendix A provides quantitative impact estimates for Alternatives E, F, G, and H from loss of forest, wetlands, and floodplains (acres), and stream channel disturbance (number of crossings and linear feet of stream channel affected). Comparable data was not provided for the build alternative eliminated in Phase 1; if similar environmental impact data is available for those alternatives we would like the opportunity to review it.

#### Comments on Alternatives to be Carried Forward

We have conducted a brief inspection of potentially sensitive areas along Alternative F (the existing US 31 route alternative), however we have not inspected the new alignment portion of Alternative G. We cannot provide comprehensive comments at this point, however we will provide preliminary comments based on the data in Table A-1.

Alternative G would result in greater loss of forest (85 acres vs 58 acres for Alternative F), forested wetland (8 acres vs 3 acres) and floodplains (54 acres vs 38 acres). Alternative F would result in slightly greater stream impacts (12 crossings vs 11, and 5170 linear feet vs 4715 feet). A functional comparison of stream impacts cannot be determined without field studies. The streams, floodplains and wetlands along the existing alignment have already been disturbed, therefore the functional extent of impacts may be greater in undeveloped areas along the new alignment of Alternative G.

As discussed in our previous letters and in your meeting minutes, our major concern with this project is the Cool Creek corridor and floodplain wetland complex that it located near the existing US 31/SR 431 interchange. The two remaining alternatives would have identical and substantial impacts on wildlife habitat in this location, especially in view of cumulative impacts from other construction projects recently completed or currently under review. We strongly recommend that the environmental analysis provide alternatives for the configuration of this interchange to minimize habitat loss.

Another area of concern previously mentioned is a forested section of the Cool Creek floodplain near US 31 north of 156<sup>th</sup> Street. Based on Figures A-1 and A-3 it appears

that Alternative G could have substantial impacts on the stream, floodplain and riparian forest in this location, and also further upstream along Cool Creek.

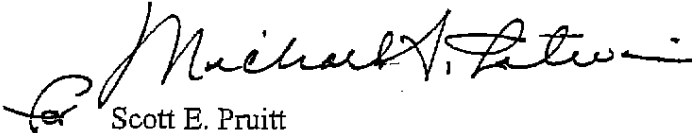
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This endangered species information is provided for technical assistance only, and does not fulfill the requirements of Section 7 of the Endangered Species Act.

For further discussion please contact Mike Litwin at (812) 334-4261 (ext. 205).

Sincerely yours,

  
Scott E. Pruitt  
Field Supervisor

cc: Federal Highway Administration, Indianapolis, IN  
Virginia Laszewski, US EPA, B-19J, Chicago, IL  
Andrew Pelloso, IDEM, Water Quality Standards Section, Indianapolis, IN  
Christie Kiefer, Indiana Division of Fish and Wildlife, Indianapolis, IN  
Manager, Environmental Assessment, INDOT, Rm 1107, Indianapolis, IN



Indiana Department of Natural Resources

Frank O'Bannon, Governor  
John Goss, Director

Environmental Unit  
Division of Water  
402 W. Washington Street, Rm. W264  
Indianapolis, IN 46204-2641

17 December 2002

Mr. Cory Grayburn, Deputy Project Manager  
Parsons Transportation Group  
11405 North Pennsylvania Street, Suite 100  
Carmel, IN 46032

**Re: DNR #9760 -US 31 improvement project, Des# 9905500; Hamilton County**

Dear Mr. Grayburn:

The Indiana Department of Natural Resources has reviewed the above referenced project per your request. Our agency offers the following comments for your information and in accordance with the National Environmental Policy Act of 1969.

This proposal will require the formal approval of our agency for construction in a floodway, pursuant to the Flood Control Act (IC 14-28-1). Please submit a copy of this letter with the permit application(s).

The Natural Heritage Program's data have been checked. To date, no plant or animal species listed as state or federally threatened, endangered, or rare have been reported to occur in the project vicinity.

Two possible alternatives (F and G) are being considered for this project. Both alternatives call for upgrading US 31 to a six lane restricted access freeway. Alternative F would route the new freeway along the existing US 31 alignment. Alternative G would route the new freeway to the east around the town of Westfield. Alternative F would disturb the fewest fish and wildlife habitat areas including forest land, herbaceous rangeland, open land, shrub/brush rangeland, wetlands, open water, and streams, so impacts to fish, wildlife, and botanical resources as a result of this alternative being chosen would be minimal and reasonable.

There were five (5) different locations within the proposed Alternative G alignment that were inspected. We have described them below as sites 1 through 5.

Site 1 (located in the SW1/4, SE1/4, NE1/4, SEC 12, T18N, R3E) is mid-successional upland hardwood forest. If left undisturbed, this area will continue through successional stages and may be an important local habitat site for neotropical migratory songbirds.

Site 2 (located in the SW1/4, NE1/4, NW1/4, SEC 7, T18N, R3E) is mid to late successional floodplain or riparian forest bordering Cool Creek. This area displayed the greatest diversity of fish, wildlife, and botanical resources of all of the sites visited. This area is within the summer breeding range of the Blue-gray Gnatcatcher, American Redstart, Willow Flycatcher, Red-eyed Vireo, and Common Yellowthroat. Wooded riparian corridors are important habitat areas that buffer impacts to streams and rivers, allow for the movement/migration of wildlife between larger natural areas or through congested urban areas, provide essential habitat for fish and wildlife, and allow for native plant distribution and diversity. Riparian corridors are limited resources that are difficult to replace.

Site 3 (located in the NE1/4 and SW1/4, NE1/4, SE1/4, SEC 6, T18N, R3E) is mid successional upland hardwood forest. This area is within the migration route for the Tennessee Warbler and may indicate an important local resting/feeding area. This area is also within the summer breeding range of the American Redstart, Red-eyed Vireo, and Eastern Wood Pewee and may indicate an important local habitat site.

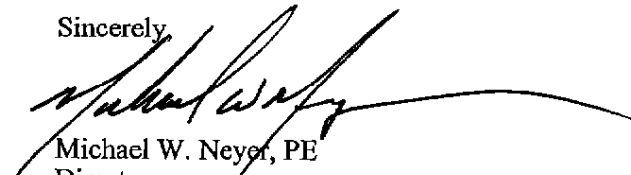
Letter to Mr. Grayburn  
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Site 4 (located in the NE1/4 and SE1/4, SE1/4, NE1/4, SEC 30, T19N, R3E) is late successional upland hardwood forest. A good number of mature, large diameter trees were present including: 24" dbh White Ash, 33" dbh Red Oak, 46" dbh Chinquapin Oak, and 50" dbh White Oak. Late successional hardwood forests are important localized habitat areas. It takes years and years to restore/replace the structure and species composition of a mature hardwood forest. If left undisturbed, this area will continue to be an important local habitat site.

Site 5 (located in the NE1/4, NW1/4, NE1/4, SEC 30, T19N, R3E) is mid to late successional hardwood forest with a good balance of large dbh trees and a healthy mid successional understory. Again, areas such as this are difficult to replace and, if left undisturbed, will continue to be an important local habitat site.

Our agency appreciates this opportunity to be of service and apologizes for not being able to respond sooner in this matter. Please do not hesitate to contact Christie Kiefer, Environmental Coordinator at (317) 232-4160 or at 1-877-928-3755 if we can be of further assistance.

Sincerely,



Michael W. Neyer, PE  
Director  
Division of Water

Note: Please include the above DNR # on any future correspondence regarding this project.